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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAULETTE WALKER PERRY,

Petitioner,

vs.

DWIGHT NEVEN, *et al.*,

Respondents.

Case No. 2:18-cv-01573-RFB-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME (SECOND
REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a 60-day enlargement of time, to and including October 24, 2022, to respond to Paulette Perry's ("Perry") amended habeas corpus petition (ECF No. 30).

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

Respondents have requested one prior enlargement of time to respond to Perry's amended petition. The current response due date is August 23, 2022. This motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 17th day of August, 2022.

AARON D. FORD
Attorney General

By: /s/ Geordan Goebel
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DECLARATION OF COUNSEL

I, Geordan Goebel, hereby state, based on personal knowledge, that the assertions of this declaration are true:

1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of Nevada in the Post-Conviction Division (PCD), and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a sixty (60) day enlargement of time, to and including October 24, 2022, in which to file and serve a response to Paulette Perry's amended habeas corpus petition. This is my second request for an enlargement of time to respond to Perry's amended petition. This extension of time is necessary for me to properly prepare a response to the petition. I contacted petitioner's counsel Sandra Gillies if she had any objections to this request. Ms. Gillies had no objections, and graciously agreed to my request for this extension of time.

3. This enlargement of time request was prompted by the currently approaching response due date of August 23, 2022. I have seven other federal habeas petition responses which have been and/or are due in August, in addition to my state case workload. Due to staffing challenges, I have been tasked

1 with assisting in our office's response to a 430-page FPD death penalty habeas petition, which is also due
2 very soon.

3 4. Our office is currently short staffed, both attorney and secretarial, which adversely
4 impacts our ability to prepare and file pleadings. We are also working remotely for the most part due to
5 the continuing COVID-19 challenges. The additional time is necessary to properly and timely prepare
6 the response to Perry's petition. I do not anticipate any further extensions of time will be necessary for our
7 response to Perry's petition.

8 5. This motion for enlargement of time is made in good faith and not for the purpose of
9 unduly delaying the ultimate disposition of this case.

10 6. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the
11 foregoing is true and correct.

12 Executed on this 17th day of August, 2022.

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14 /s/ Geordan Goebel
Geordan Goebel

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17 **ORDER**

18 IT IS SO ORDERED.

19 Dated this 18th day of August, 2022.

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23 **RICHARD E. BOULWARE, II**
24 **United States District Court**
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 17th day of August, 2022, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (SECOND REQUEST)** by U.S. District Court CM/ECF electronic filing to:

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/s/ Carrie Crago